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IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

KIM SMITH,
Plaintiff

vs.

WEXFORD HEALTH SOURCES,
INC., et al.,
Defendants

NO.: 1:CV01-0817

(Caldwell, J.)

(Mannion, M.J.)

JURY TRIAL DEMANDED

FILED
HARRISBURG, PA

JAN 03 2003

MARY E. D'ANDREA, CLERK
Per Deputy Clerk

WEXFORD DEFENDANTS' MOTION FOR
FURTHER ENLARGEMENT OF TIME

AND NOW, come the Defendants, by and through their attorneys,
Lavery, Faherty, Young & Patterson, P.C., and file this Motion for Further
Enlargement of Time and in support thereof, aver as follows:

1. On December 13, 2002, the Wexford Defendants and the
Corrections Defendants each filed Motions for Summary Judgment.

2. Pursuant to the Local Rules of Court, the Concise Statement of Undisputed Material Facts, Appendix of Exhibits and Brief in Support of the Motions for Summary Judgment were due on or before Monday, December 30, 2002.

3. Due to previously scheduled commitments in other matters and family commitments for the holidays, undersigned counsel filed a motion seeking an enlargement of time until Monday, January 6, 2003, within which to file the brief and other documents in support of the pending Motions for Summary Judgment.

4. By Order dated December 20, 2002, this Honorable Court granted the Defendants' request for enlargement of time and directed that the brief and other documents in support of the pending Motions for Summary Judgment be filed on or before January 6, 2003.

5. Counsel for both the Wexford Defendants and the Corrections Defendants have expended considerable time and resources within the last two weeks preparing the supporting documentation for their respective

Motions for Summary Judgment in the matter of Clark v. Lidgett, Docket No. 01-CV-0764.

6. Undersigned counsel for the Wexford Defendants has also devoted considerable time and resources this week to preparing a defense for a request for a temporary restraining order and/or preliminary/permanent injunction in the matter of The Nationalist Movement v. The City of York, Docket No. 1-CV-02-1917.

7. Due to the foregoing circumstances, and due to commitments in other matters, undersigned defense counsel is in need of additional time to prepare and file the brief and other documents in support of the pending Motion for Summary Judgment.

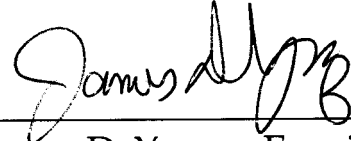
8. The requested extension of time is brief in duration; it will not prejudice any party's substantive rights; and it will not unduly delay the adjudication of this matter on the merits.

WHEREFORE, the Wexford Defendants respectfully request that this Honorable Court grant their Motion for Further Enlargement of Time and enter the accompanying Court Order.

Respectfully submitted,

Lavery, Faherty, Young &
Patterson, P.C.

By: _____



James D. Young, Esquire

Atty No. 53904

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Harrisburg, PA 17108-1245

Attys for the Wexford Defendants

DATE: _____

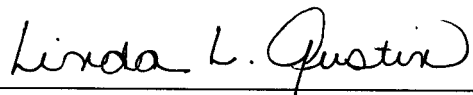
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CERTIFICATE OF SERVICE

I, Linda L. Gustin, an employee with the law firm of Lavery, Faherty, Young & Patterson, P.C., do hereby certify that on this 3rd day of January, 2003, I served a true and correct copy of the foregoing **Wexford Defendants' Motion for Further Enlargement of Time**, via U.S. First Class mail, postage prepaid, addressed as follows:

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Coal Township, PA 17866-1020

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Linda L. Gustin